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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

DELPHI CORPORATION, et al.,

Chapter 11
Case No. 05-44481 (RDD)
(Jointly Administered)

Debtors.

CREDITORS' FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

The Creditors H.E. Services Company and Robert Backie [hereinafter referred to as Creditors] in the above-captioned cases, by and through their attorneys, request that Debtors produce all documents relating to the matters listed below pursuant to the Order Pursuant to 11 USC 502 (b) and Fed.R. Bank. P. 2002 (m), 3007, 7016, 7026, 9006, 9007 and 9014 Establishing (i) Dates for Hearings Regarding Objections to Claims and (ii) Certain Notices and Procedures Governing Objections to Claims by delivering such documents to the offices of The Mastromarco Firm, 1024 N. Michigan Avenue, P.O. Box 3197, Saginaw, Michigan, 48605-3197, Attn: Victor J. Mastromarco, Jr.

Debtors means Delphi, its affiliated debtors and debtors and debtors-in-possession and/or any of its predecessor(s) or successor(s) in interest, parent corporations, subsidiaries, affiliates and other related entities, owners, officers, directors, employees, agents and beneficiaries, including attorneys, consultants and independent contractors.

H.E. Services Company also includes H.E. Services Engineering and Testing, Universal Tool, Universal Inspection, Universal Manufacturing, and an Ancon Prototype & Machine. H.E. Services also includes its facilities in Saginaw, Flint and El Paso, Texas.

Documents include, but are not limited to, the transmittal of information of any kind, in any form and by any means.

1. All documents related to any Communication between Debtors and Creditors with respect to:

- i. H.E. Services minority status and its obtainment of such status, and
- ii. Debtors' policies, procedures, and responsibilities with respect to Creditors in particular and suppliers with minority status in general.

2. All documents that the Debtors sent to or received from Creditors, including, but not limited to, contracts, invoices, receipts, requests for quotation, purchase orders, projections and estimates.

3. All documents supporting any contention made in Debtors' Objections to Creditors' Proofs of Claims, Supplemental Response or exhibits to any of the foregoing.
4. All documents identified in response to Creditors' First Set of Interrogatories.
5. All documents in support of Debtors' factual assertions (as set forth in ¶9-12 of Debtors' Supplemental Reply).
6. All documents in support of Debtors' factual assertions (as set forth in ¶19-27 of Debtors' Supplemental Reply).
7. All documents in support of Debtors' factual assertions (as set forth in ¶28 of Debtors' Supplemental Reply).
8. All documents pertaining to communication between the Debtors and Creditors regarding Creditors' Flint Facility (leading up to the opening of the facility and after the facility was opened).
9. All documents pertaining to communications between the Debtors and Creditors and between Debtors and EX-CELL-O GmbH regarding the Ex-Cello Grinding Machine.
10. All documents pertaining to communications between the Debtors and Creditors regarding the invoices and purchase orders which have been attached to Creditors' Supplemental Response.
11. Identify each and every policy pertaining to minority suppliers.

12. All documents pertaining to orders made to Prince Manufacturing, Alma Contech Manufacturing and Mariah Manufacturing Company for “lower column bracket assemblies”, “diamond size and assembly pump housings”, “machine shift tubes”, “machine PLT 2 aluminum side covers”, “press pins to support housing”, “machine sides 600 gear side covers”, “assembly lock modules”, “assembly of tilt housings” and “attainment of lock modules”.

Dated: April 23, 2007

Respectfully submitted,

THE MASTROMARCO FIRM

s/ Victor J. Mastromarco, Jr.

Victor J. Mastromarco, Jr. (P34564)

Attorney for Creditors

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CERTIFICATE OF SERVICE

Victor J. Mastromarco, Jr. being duly admitted to practice before the Southern District of New York, certifies that on the 23rd day of April 2007, I caused service of the First Request for Production of Documents to be served by e-mail and U.S. Mail upon:

Skadden, Arps, Slate, Meagher & Flom
Four Times Square
New York, New York 10036
Attn: Kayalyn A. Marafioti, Esq.
Thomas J. Matz, Esq.

Skadden, Arps, Slate, Meagher & Flom
333 West Wacker Drive
Suite 2100
Chicago, Illinois 60606
Attn: John Wm. Butler, Jr., Esq.
Albert L. Hogan, III, Esq.
John K. Lyons, Esq.
Ron E. Meisler, Esq.

Dated: April 23, 2007

s/ Victor J. Mastromarco, Jr.
Victor J. Mastromarco, Jr. (P34564)